

UNITED STATES DISTRICT COURT

for the
Eastern District of PennsylvaniaIn the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)A UPS package addressed to
514 South Avenue, Bridgeton, NJ 08302-3251

Case No. 24-mj-1593

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

A UPS package addressed to 514 South Ave. Bridgeton, NJ 08302-3251, bearing tracking no. 1Z7R07730363984618, that is currently located at the Bucks Co. DA's Office evidence warehouse at 7321 New Falls Rd. Levittown, PA 19055. located in the Eastern District of Pennsylvania, there is now concealed (identify the person or describe the property to be seized):

Controlled substances or evidence of controlled substances.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
21 USC Section 841(a)(1)	Distribution of and Possession with Intent Distribute Controlled Substances
21 USC Section 846	Conspiracy to distribute/possess with intent to distribute controlled substances
21 USC Section 843(b)	Use of mails to facilitate felony drug crime

The application is based on these facts:

See attached Affidavit.

- ☒ Continued on the attached sheet.
☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

Dale T. Keddie, Jr., Task Force Officer with DEA

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
Telephone (specify reliable electronic means).

Date: _____

City and state: Philadelphia, PA

Digitally signed by ETH
Signature
Date: 2024.10.03 16:28:33
-04'00'
Judge's signature

Honorable Elizabeth T. Hey, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN THE MATTER OF THE SEARCH OF
A UPS PACKAGE ADDRESSED TO
514 SOUTH AVENUE, BRIDGETON,
NJ 08302-3251

Case No. 24-mj-1593

AFFIDAVIT IN SUPPORT OF
SEARCH WARRANT APPLICATION

I, Dale T. Keddie, Jr., being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am an “investigative or law enforcement officer” of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code.

2. I am a Detective with the Bucks County District Attorney’s Office County Detectives and a Task Force Officer (“TFO”) with the United States Drug Enforcement Administration (“DEA”). I have been employed with the Bucks County District Attorney’s Office since May 2012. Prior to this position, I was employed as a police officer for 18 years with the Middletown Township Police Department in Bucks County, Pennsylvania, where I concentrated on drug investigations, and served as a Detective assigned to the criminal investigations division and as a Sergeant. Since 2011, I have been assigned to DEA Task Force Group 42 Financial Investigative Team, Philadelphia Division, where I investigate the illegal sales and distribution of controlled substances within the Eastern District of Pennsylvania.

3. During my law enforcement career, I participated in numerous cases involving the distribution of narcotics where I utilized court-ordered electronic surveillance as a primary

investigative technique. I have assisted in numerous investigations that involved the monitoring and recording of court-authorized Title III interceptions.

4. As a part of my official duties, I investigate criminal violations of the federal narcotics laws, including, but not limited to, Title 21, United States Code, Sections 841(a)(1), 843(b), 846, 848, 853, and 860 and Title 18 United States Code Section 1956. I have received special training in the enforcement of laws concerning controlled substances, drug trafficking organizations (“DTOs”) and money laundering as it relates to the laundering of DTOs’ drug proceeds.

5. Based on my training and experience, I am familiar with various ways in which drug dealers conduct their drug-related business, including, but not limited to their (a) methods of distributing narcotics; (b) methods of distributing drug proceeds; (c) use of telephone communication devices; (d) use of numerical codes and code words to identify themselves, the nature of the communication and to conduct their drug-related transactions; and (e) common practice of registering for and obtaining these communication devices under false names, or names of relatives and/or friends to avoid financial responsibilities and tracking of criminal activities by law-enforcement entities.

6. Based on my training and experience, along with discussions with other agents about their experience, I have become familiar with the mechanics of the parcel delivery services and have developed a good understanding of the appeal these services have for those who choose them for the illegal transportation of controlled substances. Parcel delivery services offer rapid and dependable service for most metropolitan areas. Parcels are guaranteed for delivery in the number of specified days, with a refund if the parcel does not meet the service standards. To the drug smuggler, the refund is a minor consideration, but parcels delayed beyond the normal

delivery time serve to alert the recipient that the authorities may have discovered the controlled substances. Additionally, parcel delivery services use assigned label numbers, which make it easy for the parcels to be tracked. The sender is given a time of shipment, plus the weight of the parcel.

7. On September 25, 2024, your affiant, along with TFO Thomas Fahy, TFO Diane Gonzalez, and Sergeant Miguel Martinez of the Cumberland County, New Jersey, Prosecutor's Office, encountered Pedro Zarinana Sotelo ("Sotelo"). Sotelo agreed to a non-custodial interview about his suspected drug distribution and money laundering activities in southern New Jersey and Philadelphia, Pennsylvania. Sotelo stated he was a courier for Daniel Beltran Sotelo and a Mexican male known as "Wamuchil". Sotelo stated both Beltran Sotelo and "Wamuchil" are located in Sinaloa, Mexico. Sotelo stated he received shipments of drugs through the mail at the direction of Beltran Sotelo and "Wamuchil". Sotelo stated he provided Beltran Sotelo and "Wamuchil" with fictitious names and local addresses to send the shipment of drugs. Sotelo stated he believed the drugs are cocaine, and that upon receipt of the packages Beltran Sotelo and "Wamuchil" provided him with directions along with a phone number of the person he was to meet. Sotelo stated he then made arrangements when and where to meet the person to distribute the drugs.¹

8. During the interview on September 25, 2024, Sotelo also provided investigators with incoming parcel information of another drug shipment. Sotelo stated he was expecting a package to be delivered to his address at 514 South Avenue, Bridgeton, New Jersey. Sotelo

¹ In consideration of his cooperation efforts, law enforcement did not arrest Sotelo at the time of this encounter and interview. He was not paid and did not receive compensation. Following the interview, Sotelo has left the state.

provided a photograph of the shipping label identified as a United Parcel Service (UPS) with tracking number 1Z7R07730363984618.

9. Law enforcement contacted employees of UPS who supplied the following packing information for the box with tracking number 1Z7R07730363984618 (the “Subject Parcel”):

Parcel Shipping Order (PSO) Terms and Conditions		THE UPS STORE #4672
Ship Date: 23 Sept 2024	Shipment Information: UPS Ground	Description Of Goods: Cosmetics
SENDER Cynthia Rodriguez 1113 Fedora St. Los Angeles, CA 90006 Tel: (323) 514-6993	RECIPIENT Estaben Mendes 514 South Ave. Bridgeton, NJ 08302-3251	PKG TRAKING NUMBER 1Z7R07730363984618

10. Review of law enforcement databases showed that no one by the name “Cynthia RODRIGUEZ” was associated with the return address of 1113 Fedora St. Los Angeles, CA 90006. Furthermore, that review also showed that no one by the name “Estaben MENDES” was associated with the recipient address of 514 South Ave. Bridgeton, NJ 08302. Based on my training and experience, drug traffickers who utilize carriers like UPS will frequently include false names on parcels for both the sender and/or recipient so as to distance themselves from the drug trafficking.

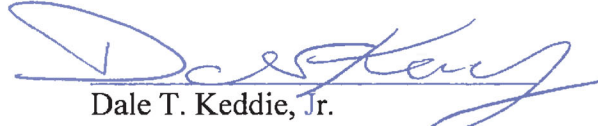
11. Based on the tracking number associated with Subject Parcel, law enforcement concluded that the package would be received on September 27, 2024, at the UPS facility located at 493 County Ave., Secaucus, NJ, 07094, (the “UPS Facility”). On September 27, 2024, Special Agent Santino Costobile and Task Force Officer Dale Keddie met with UPS representatives and located the Subject Parcel at the northeast New Jersey UPS Facility. The

Subject Parcel bore the previously referenced shipping information, as well as the tracking number.

12. TFO Keddie deployed his Police Service Dog "Tan," to sniff the package, which resulted in a positive response by Tan to the presence of controlled substances.² The Subject Parcel was recovered and transported by law enforcement to the Bucks County District Attorney's evidence warehouse located at 7321 New Falls Rd., Levittown, PA, for safekeeping.

13. Based on the facts set forth in this Affidavit, there is probable cause to believe that the Subject Parcel contains controlled substances.

14. Accordingly, your Affiant respectfully requests the Court to issue a search warrant authorizing the search and seizure of the Subject Parcel which is believed to contain controlled substances in violation of Title 21, United States Code, Sections 841(a)(1), 843(b), and 846.


Dale T. Keddie, Jr.
DEA Task Force Officer

Sworn to and Subscribed Before Me By Telephone



Digitally signed by ETH
Signature
Date: 2024.10.04 08:58:41
-04'00'

HON. ELIZABETH T. HEY
UNITED STATES MAGISTRATE JUDGE

² Police Service Dog "Tan" was certified with his handler, TFO Dale Keddie, by PennVet Working Dog Center. Police K-9 Services in Philadelphia, Pennsylvania, on July 17, 2020, after successfully completing 160 hours of training. Tan was trained to detect the odor of four controlled substances: marijuana, cocaine, heroin, methamphetamine and derivatives. TFO Keddie is a sworn police officer for the Bucks County District Attorney's Office and has been so employed as a police officer in the County of Bucks since April of 1993. During this time, TFO Keddie has utilized Tan in numerous narcotics investigations, in which Tan's positive indication for drugs was confirmed, and that have resulted in several drug seizures. K-9 Tan and TFO Keddie train monthly on all odors the dog is trained to detect. Yearly, TFO Keddie and K-9 Tan are recertified through the Bucks County District Attorney's Office Drug Detection Dog Certification. Det. Keddie and K-9 Tan are currently assigned to the DEA Task Force, Philadelphia Division.

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

In the Matter of the Search of

(Briefly describe the property to be searched
or identify the person by name and address)

A UPS package addressed to

514 South Avenue, Bridgeton, NJ 08302-3251

Case No. 24-mj-1593

WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search and seizure of the following person or property located in the Eastern District of Pennsylvania

(identify the person or describe the property to be searched and give its location):

A UPS package addressed to 514 South Ave. Bridgeton, NJ 08302-3251, bearing tracking no. 1Z7R07730363984618, that is currently located at the Bucks Co. District Attorney's Office evidence warehouse at 7321 New Falls Rd. Levittown, PA 19055.

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal (*identify the person or describe the property to be seized*):

Controlled substances or evidence of controlled substances.

YOU ARE COMMANDED to execute this warrant on or before October 17, 2024 *(not to exceed 14 days)*

☒ in the daytime 6:00 a.m. to 10:00 p.m. ☐ at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to the duty United States Magistrate Judge

(United States Magistrate Judge)

☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (*check the appropriate box*)

☐ for _____ days (*not to exceed 30*) ☐ until, the facts justifying, the later specific date of _____.

Date and time issued:

City and state: Philadelphia, PA

Digitally signed by

ETH Signature

~~Date: 2024.10.03~~

signature
16:27:58 -04'00'

Honorable Elizabeth T. Hey, U.S. Magistrate Judge

Printed name and title

AO 93C (08/18) Warrant by Telephone or Other Reliable Electronic Means (Page 2)

ReturnCase No.:
24-mj-1593

Date and time warrant executed:

Copy of warrant and inventory left with:

Inventory made in the presence of :

Inventory of the property taken and name(s) of any person(s) seized:

Certification

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: _____

*Executing officer's signature*_____
Printed name and title